

PR/LSAO#2016R00046

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2018 SEP 12 PM 4:51  
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
AT BALTIMORE

UNITED STATES OF AMERICA ~~BY~~ DEPUTY

v.

JEFFREY SOUTHALL,  
ARNAZ HARDIN,  
PERMELIA LAWSON, and  
RAENIECE BOARD,

Defendants.

CRIMINAL NO. DKC-18-0471

(Bank Fraud Conspiracy, 18 U.S.C.  
§ 1349; Bank Fraud, 18 U.S.C. § 1344;  
Aggravated Identity Theft, 18 U.S.C.  
§ 1028A; Aiding & Abetting, 18 U.S.C.  
§ 2)

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INDICTMENT

COUNT ONE

(Bank Fraud Conspiracy)

The Grand Jury for the District of Maryland charges that:

At all times material to the Indictment:

Introduction

1. Defendant **JEFFREY SOUTHALL** was an inmate at the Jessup Correctional Institute (JCI) from December 13, 2010 to July 14, 2016 and an inmate at the Roxbury Correctional Institute (RCI) since July 14, 2016.
2. Defendant **ARNAZ HARDIN** was a resident of Baltimore, Maryland.
3. Defendant **PERMELIA LAWSON** was a resident of Halethorpe, Maryland and maintained a residence at 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227.
4. Defendant **RAENIECE BOARD** was a resident of Prince George's County, Maryland.

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5. Each of the following entities was a financial institution, as defined in Section 20 of the United States Code, that had deposits that were insured by the Federal Deposit Insurance Corporation (each a “Financial Institution” and, together, the “Financial Institutions”):

- a. J.P. Morgan Chase Bank (“Chase”);
- b. State Farm Bank;
- c. Capital One Bank; and
- d. TD Bank.

6. A social security account number (commonly referred to, and referred to herein, as a “social security number”) is a 9-digit number issued to citizens, permanent residents and temporary (working) residents under section 205(c)(2) of the Social Security Act, 42 U.S.C. § 405(c)(2). The number is issued to an individual by the Social Security Administration, a component of the United States Department of Health and Human Services. Its primary purpose is to identify individuals who contribute to the social security fund and to track individuals for taxation purposes. It is also used as a means of identification. Only the individual to whom a social security number is assigned may lawfully use that number.

**The Conspiracy and the Scheme and Artifice to Defraud**

7. From in or about September 2015 through in or about August 2018, in the District of Maryland and elsewhere, the defendants,

**JEFFREY SOUTHALL,  
ARNAZ HARDIN,  
PERMELIA LAWSON, and  
RAENIECE BOARD,**

did knowingly and willfully conspire, combine, confederate and agree with each other and with other persons known and unknown to the Grand Jury together to knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution, and to obtain money

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and property owned by and under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations and promises, and material omissions, in violation of Title 18, United States Code, Section 1344 (“the scheme to defraud”).

**Object of the Conspiracy and the Scheme to Defraud**

8. It was the object of the conspiracy and scheme and artifice to defraud to obtain unlawfully credit cards from banks, including the Financial Institutions, in the name of other individuals for the purpose of using the credit cards or causing them to be used to make or attempt to make purchases.

**Manner and Means of the Conspiracy and Scheme to Defraud**

9. It was part of the conspiracy and the scheme and artifice to defraud that **JEFFREY SOUTHALL** unlawfully possessed the name, date of birth, and social security number of various individuals, including “H.F.,” “S.Y.,” “T.L.,” “M.A.,” “W.F.,” “S.C.,” “E.J.,” and “S.L.” (each a “Victim”).

10. It was further part of the conspiracy and the scheme and artifice to defraud that **JEFFREY SOUTHALL** provided the personal identification information of Victims to **ARNAZ HARDIN, PERMELIA LAWSON, and RAENIECE BOARD**, and others known and unknown to the Grand Jury, for the purpose of obtaining credit cards from banks, including the Financial Institutions.

11. It was further part of the conspiracy and the scheme and artifice to defraud that **JEFFREY SOUTHALL, ARNAZ HARDIN, and RAENIECE BOARD**, and others known and unknown to the Grand Jury, used the name, date of birth, and social security number of Victims to apply for and/or activate credit cards issued by banks, including the Financial Institutions.

12. It was further part of the conspiracy and the scheme and artifice to defraud that

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**PERMELIA LAWSON** would receive credit cards in the names of Victims issued by banks, including the Financial Institutions at 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227.

13. It was further part of the scheme and artifice to defraud that **JEFFREY SOUTHALL, ARNAZ HARDIN, PERMELIA LAWSON**, and others known and unknown to the Grand Jury, used credit cards in the name of Victims issued by banks, including the Financial Institutions, and caused the cards to be used to make or attempt to make purchases.

14. It was further part of the conspiracy and scheme to defraud that the defendants would communicate with one another via phone and text message, including by conducting three-way phone calls.

15. It was further part of the conspiracy that **JEFFREY SOUTHALL, ARNAZ HARDIN**, and others known and unknown to the Grand Jury, used or caused to be used the email account jessup914@gmail.com in connection with credit card applications to banks, including the Financial Institutions.

**Acts in Furtherance of the Conspiracy and Scheme to Defraud**

16. The allegations contained in Paragraphs 2 through 5 of Count Three; Paragraphs 2 through 4 of Count Four, Paragraphs 2 through 4 of Count Five; Paragraph 2 through 7 of Count Six are incorporated by reference here.

18 U.S.C. § 1349

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**COUNT TWO**  
**(Aggravated Identity Theft)**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 6 and 8 through 15 of Count One of the Indictment are incorporated by reference here.
2. From in or about September 2015 and continuing until in or about August 2018, in the District of Maryland and elsewhere, the defendants,

**JEFFREY SOUTHALL,  
ARNAZ HARDIN,  
PERMELIA LAWSON, and  
RAENIECE BOARD,**

did, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), knowingly transfer, possess and use, without lawful authority, a means of identification of another person, to wit: the defendants used the means of identification of various individuals during and in relation to bank fraud conspiracy under 18 U.S.C. § 1349, as set forth in Count One of the Indictment and as to Counts Two through Six of the Indictment as to each defendant charged respectively therein.

18 U.S.C. §§ 1028A(a)(1), (c)(5)  
18 U.S.C. § 2

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**COUNT THREE**  
**(Bank Fraud)**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 6 and 8 through 15 of Count One of the Indictment are incorporated by reference here.
2. On or about September 11, 2015, **JEFFREY SOUTHALL** provided the name, date of birth, and social security number of Victim “H.F.” to **ARNAZ HARDIN**, so that he could open an account and obtain a credit card from Chase.
3. On or about September 11, 2015, **ARNAZ HARDIN** used “H.F.’s” name, date of birth, and social security number to apply for a credit card with Chase.
4. On date unknown to the Grand Jury but from September 11, 2015 to September 22, 2015, **PERMELIA LAWSON** received the credit card in “H.F.’s” name issued by Chase at 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227.
5. In or about October 2015, **JEFFREY SOUTHALL and ARNAZ HARDIN** used the credit card in “H.F.’s” name issued by Chase and caused it to be used to make or attempt to make purchases.
6. Beginning on or about September 11, 2015 and continuing until in or about October 2015, the defendants,

**JEFFREY SOUTHALL,  
ARNAZ HARDIN, and  
PERMELIA LAWSON,**

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a financial institution, and to obtain monies, funds and credits of financial institutions, and under the custody and control of financial institutions, by means of materially false and fraudulent pretenses, representations and promises: to wit, by using, among other things, the name, social security

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number, and date of birth of “H.F.” without “H.F.’s” consent, to cause Chase to issue a credit card in “H.F.’s” name, which was sent to 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227, and by using the credit card in “H.F.’s” name issued by Chase and causing it to be used to make or attempt to make purchases.

18 U.S.C. § 1344

18 U.S.C. § 2

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**COUNT FOUR**  
**(Bank Fraud)**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 6 and 8 through 15 of Count One of the Indictment are incorporated by reference here.
2. On or about October 6, 2015, a person unknown to the Grand Jury unlawfully used “H.F.’s” name, date of birth, and social security number to apply for a credit card with State Farm Bank, which was approved.
3. On or about November 10, 2015, **JEFFREY SOUTHALL**, while on a phone call initiated by **ARNAZ HARDIN**, used the credit card in “H.F.’s” name issued by State Farm Bank and caused it to be used to make or attempt to make purchases, which purchases were to be sent to 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227, a residence maintained by **PERMELIA LAWSON**.
4. On or about November 19, 2015, **ARNAZ HARDIN**, while on a phone call with **JEFFREY SOUTHALL**, confirmed that the purchases made using the credit card in H.F.’s name issued by State Farm Bank had arrived.
5. Beginning on or about October 6, 2015 and continuing until in or about November 10, 2015, the defendants,

**JEFFREY SOUTHALL,**  
**PERMELIA LAWSON and**  
**ARNAZ HARDIN,**

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a financial institution, and to obtain monies, funds and credits of financial institutions, and under the custody and control of financial institutions, by means of materially false and fraudulent pretenses, representations and promises: to wit, by using a card in “H.F.’s” name issued by State Farm Bank,



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fraudulently obtained and without “H.F.’s” consent, and causing it to be used to make or attempt to make purchases.

18 U.S.C. § 1344

18 U.S.C. § 2

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**COUNT FIVE**  
**(Bank Fraud)**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 6 and 8 through 15 of Count One of the Indictment are incorporated by reference here.
2. On or about February 13, 2016, **JEFFREY SOUTHALL**, while on a phone call to TD Bank initiated by **ARNAZ HARDIN**, used “S.Y.’s” name, date of birth, and social security number to apply for a credit card with TD Bank.
3. On a date unknown to the Grand Jury but from on or about February 13, 2016 through on or about March 2, 2016, **PERMELIA LAWSON** received the credit card in “S.Y.’s” name issued by TD Bank at 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227.
4. On a date unknown to the Grand Jury but from on or about March 2, 2016 through on or about March 16, 2016, **ARNAZ HARDIN** used the credit card in “S.Y.’s” name issued by TD Bank and caused it to be used to make or attempt to make purchases in the form of cash advances.
5. Beginning on or about February 13, 2016 and continuing until in or about March 16, 2016, the defendants,

**JEFFREY SOUTHALL,**  
**PERMELIA LAWSON and**  
**ARNAZ HARDIN,**

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a financial institution, and to obtain monies, funds and credits of financial institutions, and under the custody and control of financial institutions, by means of materially false and fraudulent pretenses, representations and promises: to wit, by using a card in “S.Y.’s” name issued by TD Bank,

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fraudulently obtained and without “S.Y.’s” consent, and causing it to be used to make or attempt to make purchases.

18 U.S.C. § 1344

18 U.S.C. § 2

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**COUNT SIX**  
**(Bank Fraud)**

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 through 6 and 8 through 15 of Count One of the Indictment are incorporated by reference here.
2. On or about June 29, 2016, **JEFFREY SOUTHALL** provided the name, date of birth, and social security number of Victims "M.A.," "W.F.," "S.C.," "E.J.," and "S.L." to unindicted co-conspirator 1, so that he could open accounts and obtain a credit cards from Capital One Bank.
3. On or about June 29, 2016, unindicted co-conspirator 1 used the name, date of birth, and social security number of "M.A.," "W.F.," "S.C.," "E.J.," and "S.L." to apply for credit cards with Capital One Bank.
4. On date unknown to the Grand Jury but from on or about June 29, 2016 through on or about July 11, 2016, **PERMELIA LAWSON** received credit cards in the name of "M.A.," "E.J.," and "S.L." at 200 First Avenue Apt. 213 Halethorpe, Maryland, 21227.
5. On or about July 11, 2016, **JEFFREY SOUTHALL** asked **RAENIECE BOARD** to activate certain of the fraudulently obtained Capital One credit cards, and defendant **RAENIECE BOARD** agreed to do so.
6. On or about July 11, 2016, **PERMELIA LAWSON** provided **RAENIECE BOARD** the credit card numbers for the Capital One credit cards in the names of "M.A." and "S.L." and **RAENIECE BOARD** attempted to activate them.
7. On or about July 11, 2016, while on a telephone call with **RAENIECE BOARD**, **ARNAZ HARDIN** and Capital One Bank, and while pretending to be "S.C.," defendant **JEFFREY SOUTHALL** attempted to activate a credit card fraudulently issued in the name of

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“S.C.”

8. Beginning on or about June 29, 2016 and continuing until in or about July 11, 2016, the defendants,

**JEFFREY SOUTHALL,  
ARNAZ HARDIN,  
PERMALIA LAWSON, and  
RAENIECE BOARD,**

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a financial institution, and to obtain monies, funds and credits of financial institutions, and under the custody and control of financial institutions, by means of materially false and fraudulent pretenses, representations and promises: to wit, by obtaining credit cards in “M.A,” “S.L.,” “E.J.,” and “S.C.’s” names issued by Capital One Bank, fraudulently obtained and without their consent.

18 U.S.C. § 1344  
18 U.S.C. § 2

  
\_\_\_\_\_  
ROBERT K. HUR  
United States Attorney

~~A TRUE BILL:~~  
**SIGNATURE REDACTED**  
\_\_\_\_\_  
Foreperson

Date: September 12, 2018